

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Miranda Felicia Jones

BANKRUPTCY NO. 22-50783-KMS

Debtor

Chapter 13

**RESPONSE/OBJECTION TO MOTION FOR RELIEF
FROM STAY AND FOR OTHER RELIEF**

COMES NOW, Miranda Felicia Jones, Debtor, by through her counsel and files this Response/Objection to Motion for Relief from Stay and for other relief as filed by creditor Action Financial Services (“Action”) and asserts as follows:

1. On or about July 18, 2022, Miranda Felicia Jones ("Debtor") filed a petition for relief pursuant to Title 11 of the United States Code. This Court has jurisdiction over the parties and subject matter to this action pursuant to 28 U.S.C. §§ 157 and 1334 and 11 U.S.C. §§ 554, and 362. This is a core proceeding pursuant to 28 U.S.C. § 157 (b) (2) (A), (G) and (O).

2. Debtor denies that they are indebted to Action Financial Services pursuant to a Consumer Loan Note, Security Agreement and Disclosure Statement ("Agreement").

3. Debtor asserts the loan was opened in 2016 for a 2002 GMC and that this loan was paid in full many years ago.

4. As the debt has been paid in full, Action's Motion for Relief from Co-Debtor Stay is Moot and therefore should be denied.

WHEREFORE PREMISES CONSIDERED, Miranda Felicia Jones, requests the Court deny the Creditor’s Motion to Lift the Automatic Stay In the alternative, we request the Court grant such other relief as the court deems appropriate.

DATED: Septemeber 8, 2022.

Respectfully submitted,

BY: /s/ Chelsea Bair Minton

Attorney for the Debtors

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CERTIFICATE OF SERVICE

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I certify that copies of the foregoing documents were served upon the following creditors on Septemeber 8, 2022:

David Rawlings
ecfnotices@rawlings13.net, sduncan@rawlings13.net

John S. Simpson on behalf of Creditor Action Financial Services, Inc.
jsimpson@simpsonlawfirm.net, rboone@simpsonlawfirm.net

United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

/s/ Chelsea Bair Minton
Chelsea Bair Minton